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**September 20, 2018**

**Via ECF**

Hon. Peggy Kuo, USMJ  
United States District Court, EDNY  
225 Cadman Plaza East, Courtroom 322  
Brooklyn, NY 11201  
,

**Re: Goode v. Dave Sanders & Co., Inc. et a**  
**Case No. 18-CV-04225 (FB)(PK)**  
**Motion to Adjourn Conference**

Dear Magistrate-Judge Kuo:

My firm represents Plaintiff in the above-referenced action, and I respectfully write with the consent of defense counsels to request a 45-day adjournment of the September 21, 2018 initial conference. Since the complaint was filed, the named Defendants have provided additional information concerning the use of names of the corporate defendant. As such, we intend to amend the complaint to substitute Defendants. The additional time is being requested to complete the amendment process and to give the new defendants sufficient time to respond to the complaint. This request was originally filed on September 19, 2018 but was denied without prejudice because it did not include Defendants' position - defense counsels have since consented.

We thank the Court in advance for its time and consideration.

Respectfully submitted,

Abdul Hassan Law Group, PLLC

/s/ Abdul Hassan  
By: Abdul K. Hassan, Esq. (AH6510) - *Counsel for Plaintiff*

**cc: Defense Counsel via ECF**